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Attorneys for Defendant 4 NYP Ventures LLC

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ASPEN SPECIALTY INSURANCE COMPANY
and LANDMARK AMERICAN INSURANCE
COMPANY,

Plaintiffs,

-against-

4 NYP VENTURES LLC,

Defendant.

13 Civ. 3367 (PAC)
ECF

Oral Argument Requested

**NOTICE OF MOTION FOR PARTIAL SUMMARY JUDGMENT ON BEHALF OF
DEFENDANT 4NYP VENTURES, LLC**

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 56 and Local Rule 56.1, upon the accompanying Memorandum of Law in Support of Defendant 4NYP Ventures LLC's Motion for Partial Summary Judgment, the Declaration of Geoffrey J. Greeves

and Exhibits A through AC attached thereto, and Defendant's Rule 56.1 Statement of Undisputed Material Facts, Defendant 4 NYP VENTURES, LLC ("4 NYP") will move this Court before The Honorable Paul Crotty, U.S.D.J., at the United States Court House, 500 Pearl Street, Room 14C, New York, New York 10007 at a date and time to be set by the Court, for partial summary judgment on Counts 1, 2, 4, and 5 of its Counterclaim, filed October 28, 2014.

PLEASE TAKE FURTHER NOTICE that pursuant to the parties' agreement, opposition papers, if any, shall be served by July 20, 2015 and reply papers, if any, shall be served by August 10, 2015.

Dated: New York, New York
June 19, 2015

PILLSBURY WINTHROP SHAW PITTMAN LLP

By: /s/ Geoffrey J. Greeves

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